



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Chris Reykdal
State Superintendent of Public Instruction
Washington Office of Superintendent of Public Instruction
Mail stop: 47200 Old Capitol Building
PO Box 47200
Olympia, WA 98504

March 13, 2017

Dear Superintendent Reykdal:

Thank you for your participation in the U.S. Department of Education's (the Department) assessment peer review process under Title I of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB). The Every Student Succeeds Act (ESSA) maintains the essential requirements from NCLB that each State annually administer high-quality assessments in at least reading/language arts, mathematics, and science that meet nationally recognized professional and technical standards. Therefore, as you know, the Department reinstituted peer review of State assessment systems so that each State receives feedback from external experts on the assessments it is currently administering. We appreciate the efforts required to prepare for the peer review, which occurred in June and August 2016. State assessment systems provide essential information that States, districts, principals, and teachers can use to identify the academic needs of students, target resources and supports toward students who need them most, evaluate school and program effectiveness, and close achievement gaps among students. A high-quality assessment system also provides useful information to parents about their children's advancement against and achievement of grade-level standards. The Department's peer review of State assessment systems is designed to provide feedback to States to support the development and administration of high-quality assessments.

On October 6, 2016, the Department sent a letter to chief State school officers outlining the outcomes for States related to the assessment peer review. I am writing to provide you feedback on your State's recent submission of evidence. External peer reviewers and Department staff evaluated the Washington Office of Superintendent of Public Instruction's (OSPI) submission and found, based on the evidence received, that the components of your assessment system met many, but not all, of the statutory and regulatory requirements of section 1111(b)(1) and (3) of the ESEA, as amended by NCLB. Based on the recommendations from this peer review and our own analysis of the State's submission, I have determined the following:

- Reading/Language Arts (R/LA) and mathematics general assessments in grades 3-8 (Smarter Balanced): **Substantially meets requirements**
- R/LA and mathematics general assessments in high school (Smarter Balanced): **Substantially meets requirements**

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

- R/LA and mathematics alternate assessments based on alternate academic achievement standards (Washington Access to Instruction and Measurement (WA-AIM)) in grades 3-8 and high school: **Partially meets requirements**

The components that **substantially meet requirements** meet most of the requirements of the statute and regulations but some additional information is required. The Department expects that OSPI should be able to provide this additional information within one year.

The component that **partially meets requirements** does not meet a number of the requirements of the statute and regulations and OSPI will need to provide substantial additional information to demonstrate it meets the requirements. The Department expects that OSPI may not be able to submit all of the required information within one year.

The specific list of items required for OSPI to submit is enclosed with this letter. Because some of the State's components have partially met the requirements, the Department is placing a condition on the State's Title I grant award related to those components of the assessment system. To satisfy this condition, OSPI must submit satisfactory evidence to address the items identified in the enclosed list. OSPI must submit a plan and timeline within 30 days outlining when it will submit all required additional documentation for peer review. The Department will also host regular (e.g., quarterly) progress calls with the State to discuss the State's progress on its timeline. If, following the peer review of the additional evidence, adequate progress is not made, the Department may take additional action. Additionally, the Office of Special Education and Rehabilitative Services (OSERS) will monitor progress on matters pertaining to requirements in the Individuals with Disabilities Education Act (IDEA) related to the participation of students with disabilities in Title I assessments. Insufficient progress to address such matters may lead OSERS to place a condition on OSPI's IDEA Part B grant award.

The Department notes that OSPI requested and received approval on June 24, 2016, for a waiver from assessing speaking standards for the 2016–2017, 2017–2018, and 2018–2019 school years.

In addition, the full peer review notes from the review are enclosed. These recommendations to the Department formed the basis of the Department's determination. Please note that the peers' recommendations may differ from the Department's feedback; we encourage you to read the full peer notes for additional suggestions and recommendations for improving your assessment system beyond what is noted in the Department's feedback. Department staff will reach out to your assessment director in the next few days to discuss the peer notes and the Department's determination and to answer any questions you have.

Thank you for your ongoing commitment to improving educational outcomes for all students. I look forward to our continued partnership as we move ahead with this critical work. I appreciate the work you are doing to improve your schools and provide a high-quality education for your students.

If you have any questions, please contact Millie Bentley-Memon of my staff at:
OSS.Washington@ed.gov.

Sincerely,

/s/

Monique Chism Ph.D
Acting Assistant Secretary
Elementary and Secondary Education

Enclosures

cc: Robin Munson, Director of Assessment

Critical Elements Where Additional Evidence is Needed to Meet the Requirements for Washington's Assessment System

Critical Element	Additional Evidence Needed
2.1 – Test Design and Development	<p>For the R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence that the Smarter Balanced test design aligns the assessments to the full depth and breadth for all of the academic content standards in R/LA (including speaking) and mathematics at each grade level. [NOTE: Washington has received a speaking waiver; therefore, the Department does not expect Washington to submit additional evidence regarding speaking during the period of the waiver.] • Evidence that the item selection procedures for the computer adaptive test online assessment adequately deliver tests that meet test design requirements for the intended depth of knowledge (DOK) of the assessments (also applies to evidence requested for element 2.2). • Evidence that, for cases where an assessment includes off-grade level content, assessments produce grade level student achievement scores that are based only on grade-level content items. • Evidence that the item pools for all versions of the assessments (e.g., general, American Sign Language, Braille and Spanish) are sufficient to support the test design requirements.
2.2 – Item Development	<p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • See evidence regarding DOK and item pools in element 2.1 above. <p>For the R/LA and mathematics AA-AAAS in grades 3-8 and high school (WA-AIM), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of a technically sound process to develop and select items to assess student achievement based on the State's academic content standards in terms of content and cognitive processes, including higher-order thinking skills. • A description of outcomes and follow-up activities resulting from performance task item reviews.
2.3 – Test Administration	<p>For the R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of contingency plans to address potential technology issues during test administration <p>For the R/LA and mathematics AA-AAAS in grades 3-8 and high school (WA-AIM), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of clear, thorough and consistent standardized

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	<p>procedures for the administration of the AA-AAAS, including administration with accommodations.</p>
2.5 – Test Security	<p>For the R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced) and the AA-AAAS in grades 3-8 and high school, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of documentation of test security incidents, disaggregated by type, that occurred in 2014–2015 along with follow-up/outcomes.
3.1 – Overall Validity, including Validity Based on Content	<p>For Reading/ language arts (R/LA) and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence as noted for all item pools in element 2.1 above. • Evidence that Smarter Balanced assessments that include off-grade level content conform to the on-grade level blueprint for the assessment. • Evidence of alignment of sample test forms for grades 3, 4, 6 and 7 in R/LA and mathematics. • Evidence of plans to improve alignment of the tests. <p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence including the results of the AA-AAAS alignment study to support evidence for the validity of the alternate assessments.
3.4 – Validity Based on Relationships with Other Variables	<p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Validity evidence indicating the State’s assessment scores are related as expected with other variables.
4.1 – Reliability	<p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of test reliability that account for the unique items administered to individual students on the test (e.g., a generalizability coefficient with an items within person design (<i>i:p</i>)).
4.2 – Fairness and Accessibility	<p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence that the WA-AIM assessments are accessible to all students and fair across student groups. <p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of estimated reliability for students receiving accommodations using operational data.

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4.3 – Full Performance Continuum	<p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • See evidence regarding DOK and item pools in element 2.1 above.
4.4 – Scoring	<p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of established and documented standardized scoring procedures and protocols. <p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence that Smarter Balanced has clear, unambiguous criteria to ensure and document inter-rater reliability for States that are conducting hand-scoring of Smarter Balanced performance items. These criteria should include minimum thresholds for all States.
4.6 – Multiple Versions of an Assessment	<p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of the design and development of the item pools used to support multiple versions of the assessments, specifically: <ul style="list-style-type: none"> ○ computer-adaptive in ASL (R/LA listening only, Math); ○ computer-adaptive in Braille (R/LA, math); ○ computer-based fixed form in Braille (math) ○ paper in Braille (R/LA, Math); ○ computer-adaptive in Spanish (Math); and ○ paper in Spanish (Math). ○ Evidence that item pools for these additional computer adaptive versions can support the adaptive test design.
4.7 – Technical Analysis and Ongoing Maintenance	<p>For the WA-AIM R/LA and mathematics alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of a system for monitoring and maintaining, and improving as needed, the quality of its alternate assessments, including clear and technically sound criteria for the analyses of all of the alternate assessments in its assessment system.
5.2 – Procedures for including ELs	<p>For R/LA and mathematics general assessments in grades 3-8 and HS (Smarter Balanced), OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence of guidance regarding selection of the Spanish version of the Smarter Balanced assessments for English learners, and evidence of procedures for communication of this guidance to districts, schools, teachers and parents.

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5.4 – Monitoring Test Administration for Special Populations	<p>For all general and alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence that students receive appropriate accommodations, consistent with accommodations provided to the students during instruction and/or practice and consistent with assessment accommodations identified by a student’s IEP Team or 504 team for students with disabilities; or another process for an English learner. • Evidence of the results of monitoring test administrations for special populations.
6.4 – Reporting	<p>For all OSPI general and alternate assessments in grades 3-8 and HS, OSPI must provide:</p> <ul style="list-style-type: none"> • Evidence that reports are available in alternate formats upon request; • Evidence that the State follows a process and timeline for delivering individual student reports to parents, teachers, and principals as soon as practicable after each test administration; and • Evidence that the AA-AAAS student score reports provide valid and reliable information regarding a student’s achievement and provide information to help parents, teachers, and principals interpret the test results and address the specific academic needs of students.